

## State Water Resources Control Board

March 30, 2016

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7015 1520 0001 8019 5951**

Mr. Juan Oliva  
Chief Engineer  
Los Angeles County Harbor  
UCLA Medical Center  
1000 West Carson Street  
Torrance, California 90502  
[joliva@dhs.lacounty.gov](mailto:joliva@dhs.lacounty.gov)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT HARBOR-UCLA MEDICAL CENTER, 1000 WEST CARSON  
STREET, TORRANCE**

Dear Mr. Oliva:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on March 24, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit</b> – A current Permit to Operate was not available at time of inspection.	All	March 24, 2016	Ongoing	H&SC 25284(a)
2	<b>Failure to Maintain Facility and Tank Information (A&amp;B Forms)</b> – The Tank forms are incomplete and incorrect.	All	March 24, 2016	Ongoing	23 CCR 2711(a)(6)
3	<b>Failure to Maintain Monitoring Plan</b> – The monitoring plans are incomplete and incorrect.	All	March 24, 2016	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1)
4	<b>Failure to Monitor Product Piping</b> – The sensors in the piping sumps were unable to detect a leak at the earliest opportunity because the sensors were not in the vertical position.	Both 15,000 gallon tanks	March 24, 2016	Ongoing	23 CCR 2630(d)

No.	Violation	Tank	Start Date	Stop Date	Regulation
5	<b>Failure to Monitor Product Piping</b> – Daily visual log and annual 0.1 gph piping test are required for pressurized emergency generator piping.	Both 15,000 gallon tanks	March 24, 2016	Ongoing	23 CCR 2636(f)(4), 2636(f)(6)
6	<b>Failure to Monitor Product Piping</b> – Transition sump for pressurized piping does not have a sensor and is not monitored.	Both 15,000 gallon tanks	March 24, 2016	Ongoing	H&SC 25291(b);
7	<b>Failure to Monitor Tank</b> – The single-walled tank monitoring panel is programmed to perform a monthly 0.2 gph test; however, monthly test results for the past three years were not observed during the inspection. Additionally, the tank gauge used to monitor the tank was not tagged.	25,000 gallon tank	March 24, 2013	Ongoing	H&SC 25292(a); 23 CCR 2643(b), 2712(b)
8	<b>Failure to Maintain Financial Responsibility</b> – Incomplete and incorrect financial responsibility forms and mechanisms are being used by the facility.	All	March 24, 2016	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles County Department of Public Works within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Mr. Thomas Henderson  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, California 95814  
[tom.henderson@waterboards.ca.gov](mailto:tom.henderson@waterboards.ca.gov)

**Local CUPA**

Mr. Luke Mitchell  
Associate Civil Engineer  
Los Angeles County Department of  
Public Works  
900 S. Fremont Avenue  
Alhambra, California 91803  
[lmitchell@dpw.lacounty.gov](mailto:lmitchell@dpw.lacounty.gov)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Amantha Henkel". The signature is fluid and cursive, with the first name "Amantha" and last name "Henkel" clearly legible.

Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: *(via email only)*

Mr. Luke Mitchell  
Associate Civil Engineer  
Los Angeles County  
Department of Public Works  
[lmitchell@dpw.lacounty.gov](mailto:lmitchell@dpw.lacounty.gov)

Mr. Tim Smith  
Civil Engineer  
Los Angeles County  
Department of Public Works  
[tsmith@dpw.lacounty.gov](mailto:tsmith@dpw.lacounty.gov)

Mr. Ron Fickenworth  
Assistant Chief Engineer  
Los Angeles County  
Department of Health Services  
[rfickenworth@dhs.lacounty.gov](mailto:rfickenworth@dhs.lacounty.gov)